

## UNITED STATES DISTRICT COURT

for the

Northern District of Mississippi

KAREN HUGHEY, Conservator for James Hughey

*Plaintiff*

v.

TIPPAH COUNTY, MISSISSIPPI and  
TOMMY MASON, In His Individual Capacity*Defendant*

)

Civil Action No. 3:18-cv-0004-GHD-RP

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS  
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**To: Baptist Memorial Hospital - Union County  
200 Highway 30 West, New Albany, MS 38652

(Name of person to whom this subpoena is directed)

**Production:** YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See attached Exhibit A.

Place: Jacks Griffith Luciano, P.A. P.O. Box 1209 Cleveland, MS 38732	Date and Time:
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11/15/2024 10:00 am

**Inspection of Premises:** YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 10/30/2024

CLERK OF COURT

OR

/s/ Arnold U. Luciano

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) \_\_\_\_\_  
Tippah County, Mississippi \_\_\_\_\_, who issues or requests this subpoena, are:  
Arnold U. Luciano, P.O. Box 1209, Cleveland, MS, 38732, aluciano@jlpalaw.com, 662-843-6171

**Notice to the person who issues or requests this subpoena**

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

EXHIBIT "E"

Continuation:

Any and all MEDICAL RECORDS, including but not limited to doctor's records, nurses notes, medication log, x-rays, x-ray films, radiology reports, scans, physical therapy reports, diagnoses, prognoses, office records, clinic records, prescriptions, orders, correspondence, videos, and all other records concerning all rehab therapy, examinations and/or treatments, and billing records rendered to **James Allen Hughey** (DOB: [REDACTED] 1971; SSN: [REDACTED]-1951) for May 1, 2017 to June 5, 2017.

Exhibit A

EXHIBIT "E"